

WC 11-162

READ INSTRUCTIONS CAREFULLY  
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION  
REMITTANCE ADVICE  
FORM 159

STAMP & RETURN

Approved by OMB  
3060-0589  
Page No. 1 of 3

(1) LOCKBOX # 979091		<b>ACOUS BANK OCT 03 2011</b>		SPECIAL USE ONLY	
				FCC USE ONLY	
SECTION A - PAYER INFORMATION					
(2) PAYER NAME (if paying by credit card enter name exactly as it appears on the card) Sylvia Lesse				(3) TOTAL AMOUNT PAID (U.S. Dollars and cents) \$ 1,050.00	
(4) STREET ADDRESS LINE NO. 1 2154 Wisconsin Ave NW					
(5) STREET ADDRESS LINE NO. 2					
(6) CITY Washington				(7) STATE DC	(8) ZIP CODE 20007
(9) DAYTIME TELEPHONE NUMBER (include area code) (202) 333-5273				(10) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED					
(11) PAYER (FRN) 0010900918				(12) FCC USE ONLY	
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C) COMPLETE SECTION BELOW FOR EACH SERVICE. IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET					
(13) APPLICANT NAME SJI, LLC					
(14) STREET ADDRESS LINE NO. 1 112 West 10th St					
(15) STREET ADDRESS LINE NO. 2 PO Box 188					
(16) CITY Larose				(17) STATE LA	(18) ZIP CODE 70373
(19) DAYTIME TELEPHONE NUMBER (include area code) 985-693-0215				(20) COUNTRY CODE (if not in U.S.A.)	
FCC REGISTRATION NUMBER (FRN) REQUIRED					
(21) APPLICANT (FRN) 0001718600				(22) FCC USE ONLY	
COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET					
(23A) CALL SIGN/OTHER ID		(24A) PAYMENT TYPE CODE CUT		(25A) QUANTITY 1	
(26A) FEE DUE FOR (PTC) \$ 1,050.00		(27A) TOTAL FEE \$ 1,050.00		FCC USE ONLY	
(28A) FCC CODE 1		(29A) FCC CODE 2			
(23B) CALL SIGN/OTHER ID		(24B) PAYMENT TYPE CODE		(25B) QUANTITY	
(26B) FEE DUE FOR (PTC)		(27B) TOTAL FEE		FCC USE ONLY	
(28B) FCC CODE 1		(29B) FCC CODE 2			
SECTION D - CERTIFICATION					
I, <u>Sylvia Lesse</u> , certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief.					
SIGNATURE <u>Sylvia Lesse</u>				DATE <u>9-30-11</u>	
SECTION E - CREDIT CARD PAYMENT INFORMATION					
ACCOUNT NUMBER <u>[REDACTED]</u> EXPIRATION DATE <u>[REDACTED]</u>					
I hereby authorize the FCC to charge my credit card for the service(s)/authorization herein described.					
SIGNATURE <u>[REDACTED]</u>				DATE <u>[REDACTED]</u>	

SEE PUBLIC BURDEN ON REVERSE

FCC FORM 159

FEBRUARY 2003

FEDERAL COMMUNICATIONS COMMISSION  
REMITTANCE ADVICE (CONTINUATION SHEET)  
FORM 159-C

Page No. 2 of 3

SPECIAL USE

FCC USE ONLY

USE THIS SECTION ONLY FOR EACH ADDITIONAL APPLICANT  
SECTION BB - ADDITIONAL APPLICANT INFORMATION

(13) APPLICANT NAME  
**SJI Holdings, LLC**

(14) STREET ADDRESS LINE NO. 1  
**112 West 10th Street**

(15) STREET ADDRESS LINE NO. 2  
**PO Box 188**

(16) CITY  
**Larose**

(17) STATE  
**LA**

(18) ZIP CODE  
**70373**

(19) DAYTIME TELEPHONE NUMBER (include area code)  
**985-693-0215**

(20) COUNTRY CODE (if not in U.S.A.)

FCC REGISTRATION NUMBER (FRN) REQUIRED

(21) APPLICANT (FRN)  
**0021183090**

(22) FCC USE ONLY

COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET

(23A) CALL SIGN/OTHER ID

(24A) PAYMENT TYPE CODE

(25A) QUANTITY

(26A) FEE DUE FOR (PTC)

(27A) TOTAL FEE

FCC USE ONLY

(28A) FCC CODE 1

(29A) FCC CODE 2

(23B) CALL SIGN/OTHER ID

(24B) PAYMENT TYPE CODE

(25B) QUANTITY

(26B) FEE DUE FOR (PTC)

(27B) TOTAL FEE

FCC USE ONLY

(28B) FCC CODE 1

(29B) FCC CODE 2

(23C) CALL SIGN/OTHER ID

(24C) PAYMENT TYPE CODE

(25C) QUANTITY

(26C) FEE DUE FOR (PTC)

(27C) TOTAL FEE

FCC USE ONLY

(28C) FCC CODE 1

(29C) FCC CODE 2

(23D) CALL SIGN/OTHER ID

(24D) PAYMENT TYPE CODE

(25D) QUANTITY

(26D) FEE DUE FOR (PTC)

(27D) TOTAL FEE

FCC USE ONLY

(28D) FCC CODE 1

(29D) FCC CODE 2

(23E) CALL SIGN/OTHER ID

(24E) PAYMENT TYPE CODE

(25E) QUANTITY

(26E) FEE DUE FOR (PTC)

(27E) TOTAL FEE

FCC USE ONLY

(28E) FCC CODE 1

(29E) FCC CODE 2

(23F) CALL SIGN/OTHER ID

(24F) PAYMENT TYPE CODE

(25F) QUANTITY

(26F) FEE DUE FOR (PTC)

(27F) TOTAL FEE

FCC USE ONLY

(28F) FCC CODE 1

(29F) FCC CODE 2

FEDERAL COMMUNICATIONS COMMISSION  
REMITTANCE ADVICE (CONTINUATION SHEET)  
FORM 159-C

Page No 3 of 3

SPECIAL USE

FCC USE ONLY

USE THIS SECTION ONLY FOR EACH ADDITIONAL APPLICANT  
SECTION BB – ADDITIONAL APPLICANT INFORMATION

(13) APPLICANT NAME

**EATEL Acquisition, L.L.C.**

(14) STREET ADDRESS LINE NO. 1

**913 South Burnside Avenue**

(15) STREET ADDRESS LINE NO. 2

(16) CITY

**Gonzales**

(17) STATE

**LA**

(18) ZIP CODE

**70737**

(19) DAYTIME TELEPHONE NUMBER (include area code)

**225-621-4498**

(20) COUNTRY CODE (if not in U.S.A.)

FCC REGISTRATION NUMBER (FRN) REQUIRED

(21) APPLICANT (FRN)

**0021121579**

(22) FCC USE ONLY

COMPLETE SECTION C FOR EACH SERVICE, IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEET

(23A) CALL SIGN/OTHER ID

(24A) PAYMENT TYPE CODE

(25A) QUANTITY

(26A) FEE DUE FOR (PTC)

(27A) TOTAL FEE

FCC USE ONLY

(28A) FCC CODE 1

(29A) FCC CODE 2

(23B) CALL SIGN/OTHER ID

(24B) PAYMENT TYPE CODE

(25B) QUANTITY

(26B) FEE DUE FOR (PTC)

(27B) TOTAL FEE

FCC USE ONLY

(28B) FCC CODE 1

(29B) FCC CODE 2

(23C) CALL SIGN/OTHER ID

(24C) PAYMENT TYPE CODE

(25C) QUANTITY

(26C) FEE DUE FOR (PTC)

(27C) TOTAL FEE

FCC USE ONLY

(28C) FCC CODE 1

(29C) FCC CODE 2

(23D) CALL SIGN/OTHER ID

(24D) PAYMENT TYPE CODE

(25D) QUANTITY

(26D) FEE DUE FOR (PTC)

(27D) TOTAL FEE

FCC USE ONLY

(28D) FCC CODE 1

(29D) FCC CODE 2

(23E) CALL SIGN/OTHER ID

(24E) PAYMENT TYPE CODE

(25E) QUANTITY

(26E) FEE DUE FOR (PTC)

(27E) TOTAL FEE

FCC USE ONLY

(28E) FCC CODE 1

(29E) FCC CODE 2

(23F) CALL SIGN/OTHER ID

(24F) PAYMENT TYPE CODE

(25F) QUANTITY

(26F) FEE DUE FOR (PTC)

(27F) TOTAL FEE

FCC USE ONLY

(28F) FCC CODE 1

(29F) FCC CODE 2



STAMP & RETURN

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of

SJI Holdings, LLC,  
SJI, L.L.C.

and

Lafourche Telephone Company, L.L.C.

*Transferors,*

and

EATEL Acquisition, L.L.C.

*Transferee.*

For Consent to Transfer Control pursuant to  
Section 214 of the Communications Act of 1934,  
as amended

FILED/ACCEPTED

SEP 30 2011

Federal Communications Commission  
Office of the Secretary

File No. \_\_\_\_\_

**JOINT APPLICATION FOR TRANSFER OF CONTROL OF  
DOMESTIC AND INTERNATIONAL AUTHORIZATIONS PURSUANT TO  
THE COMMISSION'S STREAMLINED PROCESSING RULES**

SJI Holdings, LLC ("Holdings"), SJI, L.L.C. ("SJI"), and Lafourche Telephone Company, L.L.C. ("Latelco") (collectively, "Transferors" or the "SJI Companies"), and EATEL Acquisition, L.L.C. ("Transferee" or "EATEL") hereby request authorization for the transfer of control of a wholly-owned subsidiary of Holdings, SJI, and its subsidiary, Latelco, to EATEL. Applicants seek streamlined processing of this request pursuant to sections 63.03(b)(2) and 63.24(c) of the Commission's Rules. This Application is being filed simultaneously with the International Bureau and the Wireline Competition Bureau.

**Background**

Applicant Latelco is a rural local exchange carrier ("LEC") providing local exchange and exchange access service to approximately 5,702 residential and 4,133 business access

lines in rural portions of southern Louisiana. Latelco's direct parent company, SJI (dba Vision Long Distance), provides interstate long distance services to residents of Latelco's service area, as well as global international resale services pursuant to Commission authorization under File No. ITC-214-20020402-00156.

Applicant EATEL, a wholly-owned subsidiary of EATELCORP, L.L.C. ("EATELCORP"), is a diversified communications company, whose affiliates provide voice, data and video services predominantly in rural portions of Ascension and Livingston Parishes, Louisiana. In addition, EATELCORP affiliates also offer long distance services to subscribers in Louisiana, Mississippi, Alabama and Texas. A family-owned company serving rural Louisiana for more than 75 years, EATELCORP has extensive expertise in the telecommunications industry. Pursuant to the proposed transaction, EATEL proposes to purchase 100% of the ownership interests of SJI. After the contemplated transaction, SJI and its subsidiaries will continue to exist and operate in their respective service territories, and under the same trade names, providing service pursuant to existing rates, terms and conditions. The proposed transactions will, accordingly, be transparent to consumers.

The proposed transaction is entitled to streamlined treatment pursuant to section 63.03(b)(2)(iii) of the Commission's Rules because it would result in EATEL affiliates and subsidiaries having a market share in the interstate, interexchange market of less than 10%; similarly, the EATEL local exchange affiliates and subsidiaries would have, collectively, fewer than 2% of the subscriber lines installed in the aggregate nationwide. Furthermore, the transaction would result in no new overlapping or adjacent local service areas.<sup>1</sup>

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<sup>1</sup> Approximately 100 of Latelco local exchange subscribers have selected EATEL long distance affiliates as their primary interexchange carrier, thus a minor cross-service overlap exists. There is no overlap in local exchange territory, either incumbent or competitive between SJI and its affiliates and EATEL and its affiliates, nor are there any adjacent local exchange operations.

### **Description of the Transaction**

This transaction will be accomplished through the sale of all of the membership interests in SJI by its parent, Holdings, to EATEL, a company created for the purpose of effecting this transaction. Following the sale, SJI will be a wholly-owned subsidiary of EATEL. SJI's operating subsidiaries will continue their current operations.

### **Transfer of Control of International Section 214 Authorization**

Applicant SJI resells switched international long distance toll services to residential and business customers pursuant to an international Section 214 authorization granted by the Commission under File No. ITC-214-214-20020402-00156. In accordance with the requirements of Section 63.24(e) of the Commission's Rules, Applicants submit the following information:

#### **(1) Name, address and telephone number of each applicant:**

##### **Transferors:**

SJI Holdings, LLC  
SJI, L.L.C.  
Lafourche Telephone Company, L.L.C.  
112 West 10<sup>th</sup> Street  
PO Box 188  
Larose, LA 70373  
Tel: (985) 693-0215  
Fax: (985) 693-5800

##### **Transferee:**

EATEL Acquisition, L.L.C.  
913 South Burnside Avenue  
Gonzales, LA 70737  
Phone: (225) 621-4388  
Fax: (225) 644-8566

**(2) Government, state or territory under the laws of which each corporate or partnership applicant is organized**

Holdings is a limited liability company organized under the laws of the state of Delaware. SJI and Latelco are limited liability companies organized under the laws of the state of Louisiana.

EATEL is a limited liability company organized under the laws of the state of Louisiana.

**(3) Name, title, post office address, and telephone number of the officer or contact point to whom correspondence concerning the application is to be addressed**

For the SJI Companies:

Tony Duet  
President and Chief Executive Officer  
112 West 10<sup>th</sup> Street  
PO Box 188  
Larose, LA 70373  
Tel: (985) 693-0215  
Fax: (985) 693-5800

For EATEL:

John D. Scanlan  
President and Vice Chairman  
913 South Burnside Avenue  
Gonzales, LA 70737  
Tel: (225) 621-4388  
Fax: (225) 644-8566

*With a copy to:*

Sylvia Lesse  
Communications Advisory Counsel, LLC  
2154 Wisconsin Avenue, NW  
Washington, DC 20007  
Tel. 202-333-5273  
Fax 202-333-5274

**(4) Statement as to whether the applicant had previously received authority under Section 214 of the Act.**

EATELCORP subsidiary Advanced Tel, L.L.C. is authorized to provide international switched and resale services pursuant to File No. ITC-214-19940131-00027. EATELCORP

indirect subsidiary TLX Communications, Inc. d/b/a Telamerica provides international services pursuant to File No. ITC-95-475.

**(5) Name, address, citizenship and principal business of any person or entity that directly or indirectly owns at least ten percent of the equity of the applicant entities:**

**Transferor:**

SJI, the 100% owner of Latelco, is the wholly-owned subsidiary of Transferor Holdings. Boston Ventures Limited Partnership VII is the only 10% or greater direct owner of Holdings (holding approximately 95%). The 10% or greater owners of Boston Ventures Limited Partnership VII and the general partners are:

<u>Name and Address</u>	<u>Percentage Ownership</u>	<u>Citizenship</u>	<u>Principal Business</u>
Hartford Financial Services Group, Inc.* Hartford Plaza Hartford, CT 06115	approx. 11% (limited partner)	US	insurance and investments
State of Connecticut Retirement Plans and Trust Funds 55 Elm Street Hartford, CT 06106	approx. 20% (limited partner)	US	investment
Boston Ventures Company VII, LLC c/o BV Investment Partners, LLC 125 High Street 17th Floor Boston, MA 02110	2% (general partner)	US	investment

\*The Hartford Financial Services Group, Inc. holds this interest indirectly through its subsidiaries, Hartford Life Insurance Co. and Hartford Fire Insurance Co., neither of which holds a ten percent interest in Boston Ventures Limited Partnership VII. The Hartford Financial Services Group, Inc. is a Delaware corporation and is publicly traded on the New York Stock Exchange. Based upon a review of the most recent information available, there are no ten percent or more shareholders of The Hartford Financial Services Group, Inc.

Boston Ventures Company VII, LLC, the general partner ("GP") of Boston Ventures Limited Partnership VII, is principally engaged in investments. The managing directors of the GP control the GP. Set forth below are all of the managing directors of the GP. This list includes all of the owners of the GP who have a ten percent or greater interest in the GP. No individual listed below holds a fifty percent or greater interest in the GP.



<b>Name</b>	<b>Address</b>	<b>Citizenship</b>
Barry Baker	c/o BV Investment Partners, LLC 125 High Street 17th Floor Boston, MA 02110	USA
Anthony J. Bolland**	c/o BV Investment Partners, LLC 125 High Street 17th Floor Boston, MA 02110	United Kingdom
Roy F. Coppedge	c/o BV Investment Partners, LLC 125 High Street 17th Floor Boston, MA 02110	USA
Andrew C. Davis	c/o BV Investment Partners, LLC 125 High Street 17th Floor Boston, MA 02110	USA
Elizabeth Granville-Smith	c/o BV Investment Partners, LLC 125 High Street 17th Floor Boston, MA 02110	USA
Gerald S. Hobbs	c/o BV Investment Partners, LLC 125 High Street 17th Floor Boston, MA 02110	USA
Vikrant Raina**	c/o BV Investment Partners, LLC 125 High Street 17th Floor Boston, MA 02110	India

\*\* Pursuant to the terms of the GP's operating agreement, non-US citizens may not participate in any matters relating to any media and regulated communications enterprises of the GP, including any media or communications companies in which the GP or Boston Ventures Limited Partnership VII may invest, and are subject to other restrictions on their participation in the operation of the GP and the limited partnership in accordance with the FCC's insulation criteria.

**Transferee:**

The sole member and 100% owner of EATEL is EATELCORP.

The following persons are the only owners of 10% or more equity in EATELCORP:

<u>Name and Address</u>	<u>Percentage Ownership<sup>2</sup></u>	<u>Citizenship</u>	<u>Principal Business</u>
Beryl Scanlan Smith 913 S. Burnside Ave Gonzales, LA 70737	16.8% voting	US	communications
The 2004 RBS/BSS Trust 913 S. Burnside Ave Gonzales, LA 70737 (Beryl Scanlan Smith, Trustee) <sup>3</sup>	11.3% voting	LA trust	investments
The 2004 RBS/AGSII Trust 913 S. Burnside Ave Gonzales, LA 70737 (Arthur G. Scanlan, II, Trustee)	11.3% voting	LA trust	investments
The 2003 DPS Trust 913 S. Burnside Ave Gonzales, LA 70737 (Arthur G. Scanlan, II, Trustee) <sup>4</sup>	16.7% voting	LA Trust	investments
The 2004 RBS/JDS Trust 913 S. Burnside Ave Gonzales, LA 70737 (John D. Scanlan, Trustee) <sup>5</sup>	11.3% voting	LA Trust	investments

<sup>2</sup> The ownership interests listed above are Class A, the only voting equity interest. In addition, Class B (non-voting) ownership interests are held or controlled as follows: Beryl Scanlan Smith: 25.3%; Arthur G. Scanlan, II: 5.5%; The 2003 CLR Trust (John D. Scanlan, Trustee): 12.1%; The 2003 AGIII Trust: 15.5%; and The 2003 JPS Trust: 15.5%; and The 2003 DPS Trust: 26.2%.

<sup>3</sup> Mrs. Smith also serves as Trustee for several smaller trusts, with additional combined voting interests totaling 3.9%. Accordingly, Ms. Smith's total voting interest equals 32.0%.

<sup>4</sup> Mr. Scanlan also serves as Trustee for several smaller trusts, with additional combined voting interests totaling 3.6%, as well as holding a direct interest in 2.8% voting equity. Accordingly, Mr. Scanlan's total voting interest equals 34.4%.

<sup>5</sup> Mr. Scanlan also serves as Trustee for several smaller trusts, with additional combined voting interests totaling 6.1%. Accordingly, Mr. Scanlan's total voting interest equals 17.4%.

**Transferee Ownership (cont'd)**

<u>Name and Address</u>	<u>Percentage Ownership</u>	<u>Citizenship</u>	<u>Principal Business</u>
The 2003 AGSIII Trust 913 S. Burnside Ave Gonzales, LA 70737 (Ruth Banker Scanlan, Trustee)	8.0% voting	LA Trust	investments
The 2003 JPS Trust 913 S. Burnside Ave Gonzales, LA 70737 (Ruth Banker Scanlan, Trustee) <sup>6</sup>	8.0% voting	LA Trust	investments

Beryl Scanlan Smith, Arthur G. Scanlan, II and John D. Scanlan are the children of Ruth Banker Scanlan.

**(6) Certification as to whether or not Transferee is, or is affiliated with, a foreign carrier.**

EATEL certifies that neither it nor any affiliate or successor is or will be foreign carriers, and that neither it nor any affiliate or successor is or will be affiliated with any foreign carrier.

**(7) Certification as to whether or not Transferee seeks to provide international telecommunications services to any country for which certain conditions are true.**

EATEL certifies that neither it nor any affiliate or successor will provide international telecommunications to any destination country for which EATEL or an affiliate or successor (1) is a foreign carrier in that country; (2) controls a foreign carrier in that country; (3) is owned more than 25% by or controlled by an entity that controls a foreign carrier in that country.

**(8) Showing regarding provision of international telecommunications service to a country where the applicant is a foreign carrier or is affiliated with a foreign carrier.**

N/A

**(9) Regulatory classification under Section 63.10 of the Rules for foreign-affiliated carrier.**

N/A

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<sup>6</sup> Mrs. Scanlan also holds a direct ownership interest in less than .1% of voting equity. Accordingly, Mrs. Scanlan's total voting interest equals 16%.

**(10) Certification that applicant has not agreed to accept special concessions directly or indirectly from any foreign carrier.**

Applicants certify they have not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any US international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.

**(11) Certification pursuant to 47 C.F.R. §§ 1.2001-1.2003 that no party to the application is subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 583**

Applicants hereby certify, pursuant to 47 C.F.R. §§ 1.2001-1.2003, that to the best of their knowledge, information, and belief, no party to the application is subject to denial of federal benefits pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 583.

**(12) Qualification for streamlined processing.**

This application qualifies for streamlined processing under Sections 63.12(a) and (b) of the Commission's rules. No party is affiliated with any foreign carrier in any destination market. No party has an affiliation with a dominant US carrier whose international switched or private line services the applicants seek authority to resell, and none is anticipated as a result of the public offering which likely will result in widely held interests. No party to this application seeks authority to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines. Authorization is sought to complete a public sale which would continue the current operations as a non-dominant carrier reselling the international switched services of one or more unaffiliated US carriers.



### **Transfer of Control of Domestic Section 214 Authorizations**

Pursuant to Section 63.04(b) of the Commission's Rules, Applicants submit information required pursuant to Sections 63.04(a)(6) through 63.04(a)(12) of the Commission's Rules:

#### **(1) Description of the transaction**

This application proposes the transfer of control of the domestic Section 214 authorization of SJI and Latelco through a sale of 100 percent of the ownership interests of SJI to EATEL, resulting in Latelco as an indirect wholly-owned subsidiary and SJI as a direct wholly-owned subsidiary of EATEL. State authorization to conduct the proposed transaction also will be sought by Applicants.

After the proposed transaction, Latelco and SJI dba Vision Long Distance will continue to operate in the same service territory, under the same trade name. The companies will continue to offer services pursuant to their current rates, terms and conditions. No carrier change charges are associated with the transaction, and no customer service or billing contact information will change as a result of the transfer. The transaction will not affect customers' preferred carrier freezes.

#### **(2) Description of the geographic areas in which the transferor and transferee (and their affiliates) offer domestic telecommunications services, and what services are provided in each area**

##### **Transferors:**

Latelco provides incumbent local exchange and exchange access services to approximately 9835 access lines in the exchanges of Larose, Grande Isle, Golden Meadow, Leeville and Galliano, Louisiana. A map of Latelco's service area (also showing the local service area of EATEL's affiliate, East Ascension Telephone Company, L.L.C.) is appended hereto as Attachment 1.

SJI (doing business as Vision Long Distance) offers IXC services to the local service subscribers of Latelco, currently serving approximately 5,972 customers. SJI also serves as an internet service provider in all of the Latelco service areas as well as in other portions of Lafourche Parish in southern Louisiana.

Vision Communications, LLC ("Vision"), a wholly-owned subsidiary of Latelco, offers video programming service in all of the Latelco service area as well as in other portions of Lafourche Parish in southern Louisiana. Vision also offers broadband Internet services throughout its service territory.

SJI is a certificated competitive local exchange carrier in the state of Louisiana, and has entered into an interconnection agreement with AT&T, but currently does not provide service.

**Transferee:**

EATEL is a wholly owned subsidiary of EATELCORP. EATELCORP is the parent company of the following entities: Advanced Tel, L.L.C. ("Advanced Tel"), EATEL Video, L.L.C., and East Ascension Telephone Company, L.L.C. TLX Communications, Inc. ("TLX") is a wholly owned subsidiary of Advanced Tel.

Advanced Tel and TLX are authorized to provide domestic and international long distance services. Advanced Tel is authorized to provide intrastate long distance services (interexchange services) in Louisiana, Texas, Mississippi and Alabama. Advanced Tel is also an internet service provider in Louisiana. TLX is authorized to provide intrastate long distance services (interexchange services) in Louisiana, Mississippi and Alabama.

Advanced Tel and TLX are also certificated as competitive local exchange carriers in Louisiana. Advanced Tel provides competitive local service in Denham Springs and Donaldsonville, Louisiana (both served by incumbent AT&T) and plans to provide competitive service in the future in Baton Rouge, Louisiana (also in AT&T incumbent territory).

EATEL Video, L.L.C. is a video services provider in the City of Gonzales, the Town of Sorrento, the Village of Port Vincent, the Village of French Settlement, the Village of Killian, and portions of Ascension and Livingston Parishes.

East Ascension Telephone Company, L.L.C. ("East Ascension") is the incumbent local exchange carrier providing exchange and exchange access services in portions of Ascension and Livingston Parish, Louisiana. Within the exchanges of Galvez, Gonzales, Dutchtown, Sorrento, Maurepas and French Settlement, East Ascension serves approximately 27,205 access lines.

**(3) Statement as to how the application fits into one or more of the presumptive streamlined categories in Section 63.03 of the Commission's Rules or why it is otherwise appropriate for streamlined treatment**

The instant Application is entitled to streamlined processing under Section 63.03(b)(2) (iii) of the Commission's Rules because (a) applicant local exchange carriers collectively serve fewer than two (2) percent of the nation's subscriber lines; to the extent competitive local exchange service is offered, it is offered within the service territory of a dominant local exchange telephone company that is not a party to the proposed transaction; and there are no new overlapping or adjacent local service areas among applications arising as a result of the proposed transactions; and (b) the proposed transfer would result in EATEL subsidiaries and affiliates having a market share in the interstate, interexchange market of less than 10 percent.

Altogether, the Applicants' local exchange operations serve approximately 36,040 access lines in rural portions of southern Louisiana. This comprises a minute fraction of the approximate 162,000,000 access lines and VoIP subscriptions in the nation. *See* Federal Communications Commission: Trends in Telephone Service, September 2010 (Table 8.1, End-User Switched Access Lines and VoIP Subscriptions as of December, 2008). Further, Applicants' relevant service territories neither overlap nor are adjacent. Finally, the Applicants' combined interexchange operations serve fewer than one percent (1.0%) of the interstate, interexchange market.

The proposed transaction will have no adverse effect on competition. The Applicants' affiliates' and subsidiaries' markets are individually and collectively so small that the proposed transaction will have no perceptible effect on competition. Grant of streamlined treatment for this Application is consistent with Commission precedent.

**(4) Identification of all other Commission applications related to the same transaction**

The following wireless interests are involved in the proposed transaction, and, accordingly, joint applications seeking authorization to transfer control of these licenses will be filed with the Commission:

KNKP524 (Rural Radio) held by Latelco

**(5) Statement of whether the applicants are requesting special consideration because either party to the transaction is facing imminent business failure**

Neither party to the transaction is facing imminent business failure. Therefore, Applicants are not requesting special consideration for this reason.

**(6) Identification of any separately filed waiver requests being sought in conjunction with the transaction**

No separately filed waiver requests are being sought in conjunction with the transaction.

**(7) Statement showing how grant of the application will serve the public interest, convenience and necessity, including any additional information that may be necessary to show the effect of the proposed transaction on competition in domestic markets**

The proposed ownership structure and investment participation will enable the continued provision of high-quality communications services to SJI customers. In addition, economic and strategic efficiencies will result from the transaction, benefiting the current subscribers of both companies. Because the telecommunications providers owned or controlled by EATELCORP do not provide local service in the areas served by the SJI Companies, competition will not be adversely affected by consummation of the proposed transaction.

**Conclusion**

For the foregoing reasons, the Applicants respectfully request that the Commission grant the requested on a streamlined basis.


Respectfully submitted,

SJI Holdings, LLC  
SJI, L.L.C.  
Lafourche Telephone Company, L.L.C.

*and*

EATEL Acquisition, L.L.C.

By:

  
Sylvia Lesse  
Their Counsel

Communications Advisory Counsel, LLC  
2154 Wisconsin Avenue, NW  
Washington, DC 20007  
(202) 333-5273

Date: September 30, 2011



## Telco Service Areas

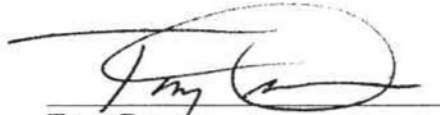


## DECLARATION OF TONY DUET

I, Tony Duet, President and Chief Executive Officer of SJI Holdings, LLC, SJI, LLC, and Lafourche Telephone Company, LLC (collectively, the "SJI Companies"), do hereby declare under penalties of perjury that I have read the foregoing "JOINT APPLICATION FOR TRANSFER OF CONTROL OF DOMESTIC AND INTERNATIONAL AUTHORIZATIONS PURSUANT TO THE COMMISSION'S STREAMLINED PROCESSING RULES," and the information contained therein regarding the SJI Companies is true and accurate to the best of my knowledge, information, and belief.

Date

9/28/2011

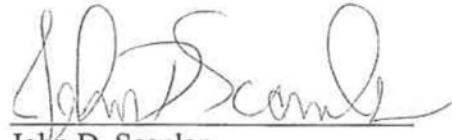


Tony Duet

## DECLARATION OF JOHN D. SCANLAN

I, John D. Scanlan, President and Vice Chairman of EATEL Acquisition, L.L.C., do hereby declare under penalties of perjury that I have read the foregoing "JOINT APPLICATION FOR TRANSFER OF CONTROL OF DOMESTIC AND INTERNATIONAL AUTHORIZATIONS PURSUANT TO THE COMMISSION'S STREAMLINED PROCESSING RULES," and the information contained therein regarding EATEL Acquisition, L.L.C. is true and accurate to the best of my knowledge, information, and belief.

Date 9-30-11

  
John D. Scanlan

## CERTIFICATE OF SERVICE

I, Sylvia Lesse, of Communications Advisory Counsel, LLC, do hereby verify that on this 30th day of September, 2011, I caused to be sent via First Class US Mail, postage prepaid, the foregoing "JOINT APPLICATION FOR TRANSFER OF CONTROL OF DOMESTIC AND INTERNATIONAL AUTHORIZATIONS PURSUANT TO THE COMMISSION'S STREAMLINED PROCESSING RULES," to the following:

The Honorable Bobby Jindal  
Governor of the State of Louisiana  
PO Box 94004  
Baton Rouge, LA 70804-9004

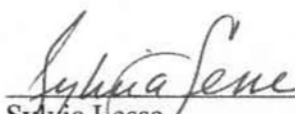
US Department of Defense  
Assistant Secretary for Network Information and Integration (NII)  
6000 Defense Pentagon  
Washington, DC 20301-6000

US Department of State  
EB/CIP/SCA  
Room 4826  
2001 C Street, NW  
Washington, DC 20520

\*Tracey Wilson-Parker  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

\*George Li  
\*JoAnn Sutton  
International Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

\*Via e-mail

  
Sylvia Lesse